

GROOM LAW GROUP

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June 10, 2022

Via ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: *Lloyd v. Argent Trust Company, et al.*
Case No. 1:22-cv-04129

Dear Judge Broderick:

On behalf of Defendant Argent Trust Company (“Argent”) and individually named Defendants Herbert Wetanson, Gregor Wetanson, and Stuart Wetanson (together with Argent, “Defendants”), we write to request that the Court extend the deadline for Defendants to respond to Plaintiff Jamaal Lloyd’s Complaint (Dkt. No. 11) to August 1, 2022. We have consulted with Plaintiff’s counsel, who have consented to the requested extension. Good cause exists for Defendants’ request, as follows:

On May 23, 2022, Plaintiff properly filed his Complaint, in which he alleges that Defendants violated various provisions of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). While Plaintiff has not filed affidavits of service with respect to any of the Defendants, Argent was served on May 25, and two of the three individual Defendants were served last week. The remaining individual Defendant has agreed to waive service. Accordingly, Argent has the earliest deadline for responding to the Complaint, currently June 15, 2022, whereas the remaining individual Defendant will not be required to respond until early August. Adjusting the response date for all Defendants will promote efficiency by allowing all Defendants, who are jointly represented, to file a single response.

Additionally, Plaintiff’s Complaint includes 187 paragraphs of allegations, which focus on a stock purchase transaction involving an employee stock ownership plan (“ESOP”) that closed on or about July 29, 2016. To allow Defendants sufficient time to investigate Plaintiff’s claims and prepare an appropriate pleading or motion, Defendants request an extension of their response deadline to August 1, 2022.

GROOM LAW GROUP

Hon. Vernon S. Broderick

June 10, 2022

Page 2

This is Defendants' first request to extend its deadline for responding to the Complaint, and the request will not affect any other scheduled dates.

Accordingly, Defendants request that the Court extend the deadline for Defendants to respond to the Complaint to August 1, 2022.

Respectfully,

[/s/ Mark C. Nielsen]

Mark C. Nielsen

Lars C. Golumbic

(pro hac vice application to be filed)

Sarah M. Adams

(pro hac vice application to be filed)

Paul J. Rinefierd

(pro hac vice application to be filed)

Larry M. Blocho Jr.

(pro hac vice application to be filed)

Counsel for Defendants

cc: Counsel of Record (via Electronic Case Filing)